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Attorneys for Defendants  
OAKLAND UNIFIED SCHOOL DISTRICT,  
KIMBERLY STATHAM and GOVERNING BOARD OF  
THE OAKLAND UNIFIED SCHOOL DISTRICT

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

FARM MENG SAEPHAN,

Plaintiff,

vs.

OAKLAND UNIFIED SCHOOL DISTRICT;  
KIMBERLY STATHAM, State Administrator of the  
Oakland Unified School District; GOVERNING  
BOARD OF THE OAKLAND UNIFIED SCHOOL  
DISTRICT,

Defendants.

Case No. C 06 4428 JCS

**JOINT STIPULATION RE STATUS OF CASE**

Plaintiff FARM MENG SAEPHAN ("Plaintiff") and Defendants OAKLAND UNIFIED SCHOOL DISTRICT; KIMBERLY STATHAM; and GOVERNING BOARD OF THE OAKLAND UNIFIED SCHOOL DISTRICT (collectively "Defendants") (Plaintiff and Defendants are collectively referred to hereinafter as the "Parties"), by and through their respective attorneys of record, hereby AGREE AND STIPULATE AS FOLLOWS:

1. The Parties hereby advise the Court that a binding and enforceable Settlement Agreement ("Agreement") has been reached and duly executed by the Parties;
2. Plaintiff is the prevailing party in this action for purposes of moving for her attorneys' fees and costs;
3. Pursuant to Plaintiff's statutory right as prevailing party to seek such fees and costs,

1 Plaintiff is entitled to apply to the Court for her reasonable attorneys' fees and costs  
2 incurred in this action and also incurred in litigating her motion for attorneys' fees and  
3 costs;

4 4. Defendants agree to pay Plaintiff's reasonable attorneys' fees and costs incurred in this  
5 action and also incurred in litigating Plaintiff's motion for attorneys' fees and costs,  
6 pursuant to the terms of the Agreement in this action;

7 5. The Parties shall file a Notice and [Proposed] Order of Dismissal of the Action with  
8 prejudice after receipt of the agreed-upon payment to Plaintiff pursuant to the  
9 Agreement;

10 6. A fee motion will be filed according to the schedule agreed upon by the Parties and as  
11 follows:

12 a. The motion shall be filed and served by July 21, 2008;

13 b. Any opposition to the motion shall be filed and served by Sept. 2, 2008;

14 c. Any reply shall be filed and served by Sept. 16, 2008;

15 d. The hearing on the motion shall be noticed and scheduled for hearing on Oct. 3,  
16 2008, or as soon thereafter as the Court may order; and

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7. The Parties hereby request the Court to retain jurisdiction over Plaintiff's motion for fees and costs and over enforcement of the Agreement in this action.

**IT IS SO STIPULATED.**

Dated: June 6, 2008

DEBORAH A. COOKSEY  
General Counsel

By: /s/  
Deborah A. Cooksey  
Attorneys for Defendants

Dated: June 6, 2008

THE LEGAL AID SOCIETY  
Christopher Ho

By: /s/  
Christopher Ho  
Attorneys for Plaintiff

Dated: June 10, 2008

